

VIA ECF

The Honorable Arun Subramanian
United States District Court, Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007-1312

Re: *United States et al. v. Live Nation Entertainment, Inc. et al.*; 1:24-cv-03973-AS-SLC

Dear Judge Subramanian:

Pursuant to the Court's instruction at the October 29, 2024 conference, Defendants submit this letter to update the Court on the status of discovery.

- Defendants produced over 600,000 documents and over 33 million observations of data to Plaintiffs during their pre-Complaint investigation.¹
- Defendants' contract reviewers have reviewed approximately 5,478,000 documents for responsiveness to Plaintiffs' document requests since the September 27, 2024 discovery conference, including approximately 200,000 documents since Defendants' last update on March 28, 2025.
- Defendants have produced approximately 1,860,000 documents and over 37.9 billion observations of data covering 8 different countries in this litigation to date, including approximately 4 billion observations of data since Defendants' last update on March 28, 2025.

Pursuant to the Court's instruction at the March 13, 2025 conference, Defendants further submit the following metric regarding Defendants' ongoing privilege review workflow.

- As of today, there are approximately 50,825 documents in Defendants' privilege review workflow that have been first-level reviewed and not yet produced or logged. There are no priority custodian documents in Defendants' privilege review workflow.

[signatures on following page]

¹ Defendants previously produced to Plaintiffs approximately 1.7 million documents between 2015 and 2019 in response to Plaintiffs' prior investigations.

Dated: April 11, 2025

Respectfully submitted,

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